

## **REMARKS/ARGUMENTS**

In response to the Examiner's first Office Action of November 29, 2005 the Applicant respectfully submits the accompanying Terminal Disclaimer with respect to USSN 10/760,200, Amendment to the specification, drawings and claims, and the below Remarks directed thereto.

### ***Regarding Amendment***

In the Amendment:

page 4, line 17, page 13, line 19, page 14, line 37, page 17, line 26, page 18, line 15 and page 22, line 17 of the present specification are amended to omit reference to Fig. 17C;

Fig. 43 is amended to include the reference sign "500", as is described at page 8, lines 23-31 of the present specification;

independent claim 1 is amended to clarify that the recited clamping arrangement removably clamps the printhead module to the casing. Support for this amendment can be found at page 13, line 37-page 14, line 36 of the present specification;

dependent claim 3 is amended to replace "locking members" with --recessed portions--. Support for this amendment can be found, for example, at page 17, line 20-page 18, line 20 of the present specification and in pending claim 4;

dependent claim 4 is amended to conform with amended claim 3, to omit "the clamped" from the recitation "lug members on the clamped the longitudinally extending tab", and to replace the recitation "the mounted positions of the at least two printhead integrated circuits" with --positions at which the at least two printhead integrated circuits are provided on the at least printhead module--. Support for this amendment can be found, for example, at page 17, line 20-page 18, line 20 of the present specification;

dependent claim 5 is amended to replace "the at least one the mounting element" with --the at least one mounting element--;

dependent claim 7 is amended to clarify that at least two fluid distribution members are provided, each for one of the printhead integrated circuits. Support for this amendment can be found at page 6, line 31-page 7, line 10 and page 8, lines 11-31 of the present specification; and

dependent claims 2 and 6 are unchanged.

It is respectfully submitted that the above amendments do not add new matter to the present application.

### ***Regarding Drawing Objections***

#### ***Regarding Fig. 17C***

It is respectfully submitted that the above-described amendments to omit reference to Fig. 17C in the present specification, provides the correction required by the Examiner.

#### ***Regarding reference sign "500"***

It is respectfully submitted that the above-described amendment to Fig. 43 to insert the reference sign "500", provides the correction required by the Examiner.

### ***Regarding Specification Objections***

It is respectfully submitted that the current Abstract conforms to the proper language and format, as set out in the Office Action. This is because, the current Abstract is a single

paragraph within the range of 50 to 150 words, it does not use legal phraseology and the language is clear and concise.

If the Examiner has any specific objections to the language used in the Abstract, it is respectfully requested that the Examiner let the Applicant know of those specific objections.

***Regarding Claim Objections***

***Regarding "locking members"***

It is respectfully submitted that the above-described amendment to claims 3 and 4 to recite "recessed portions" in place of "locking members" so as to clearly recite the lugs 43a of the support member 40 and the recessed portions 94a of the support 91, described at page 17, line 20-page 18, line 20 and illustrated in Figs. 8, 9, 17A and 17B of the present application, provides the correction required by the Examiner.

***Regarding Claim 4***

It is respectfully submitted that the above-described amendment to claim 4 to omit "the clamped" from the recitation "lug members on the clamped the longitudinally extending tab", provides the correction required by the Examiner.

***Regarding Claim 5***

It is respectfully submitted that the above-described amendment to claim 5 to replace "the at least one the mounting element" with --the at least one mounting element--, provides the correction required by the Examiner.

***Regarding "the mounted positions"***

It is respectfully submitted that the above-described amendment to claim 4 to replace the recitation "the mounted positions of the at least two printhead integrated circuits" with --positions at which the at least two printhead integrated circuits are provided on the at least printhead module--, as described at page 17, line 20-page 18, line 20 of the present specification, provides sufficient antecedent basis.

***Regarding "the fluid distribution members"***

It is respectfully submitted that the above-described amendment to claim 7 to clarify that at least two fluid distribution members are provided, each for one of the printhead integrated circuits, clarifies that the claimed fluid distribution members refer to the disclosed fluid distribution stacks 500 (see page 6, line 31-page 7, line 10 and page 8, lines 11-31 of the present specification), and therefore provides sufficient antecedent basis for this term later in the claim.

***Regarding Provisional Double Patenting Rejections***

With respect to the provisional non-statutory double patenting rejection of pending claims 1-7 over claims 1-7 of copending Application No. 10/760,200, a terminal disclaimer in compliance with 37 C.F.R. 1.321(c) is being submitted herewith; the present application and Application No. 10/760,200 being commonly owned by the Applicant.

***Regarding 35 USC 102(b) Rejections***

It is respectfully submitted that the subject matter of amended independent claim 1, and claims 2-7 dependent therefrom, is not disclosed by Silverbrook et al. (US 6,439,908), for at least the following reasons.

In the present invention, each printhead module 30 has two or more printhead tiles/integrated circuits 50,51 arranged on an elongate fluid channel member 40. At least two of these printhead modules are longitudinally assembled within a casing 20 to form a printhead. Multiple printhead modules, each having multiple printhead tiles, are used in the printhead assembly so that replacement of the modules and selection of printhead length are easily provided without the need to provide individual controllers and connections for each printhead integrated circuit.

Thermal expansion and contraction of the casing relative to the printhead modules is provided by clamping the printhead modules to the casing using the arm portions 94 of the supports 91. In particular, the clamping arrangement of the supports allow movement of the printhead modules along the longitudinal direction of the casing. Easy, removable mounting of both the drive electronics 90 for the modules and the modules themselves is provided by using the one support 91. Several of the supports are arranged along the casing to removably mount several modules, thereby providing scalability of the printhead assembly (see page 6, line 31-page 7, line 10 and page 13, line 37-page 15, line 30 of the present specification). Amended independent claim 1 recites these features of the present invention.

On the other hand, Silverbrook discloses an arrangement in which each printhead module 12 has a single microelectromechanical chip 18 and support molding 26,28. Each module is plugged into a reservoir molding 32 housing an ink reservoir 16, which is secured to a chassis 14. Each module may be removed from the reservoir molding, however scalability of the printhead assembly 10 is not provided, as the reservoir molding is a set length. Furthermore, contrary to the Examiner's contention, drive electronics are not provided on the printhead assembly of Silverbrook, rather the PCB 54 of the chassis has a connector 66 which connects to an external controller.

Furthermore, the reservoir molding is heat staked to the chassis, not clamped by the return edge 94 as contended by the Examiner. Thus, the reservoir molding is not able to move relative to the chassis. The only "clamping" arrangement disclosed by Silverbrook, is the clips 44 of the modules which clip the modules to the reservoir molding. However, as discussed above, each module does not comprise more than one printhead chip and it is the modules themselves which incorporate the clips, not a separate mounting element which also mounts drive electronics for the modules (see col. 2, lines 6-53, col. 4, lines 6-18, and col. 5, lines 3-38 of Silverbrook).

Thus, the subject matter of amended independent claim 1, and claims 2-5 dependent therefrom, is not disclosed, or suggested, by Silverbrook.

It is respectfully submitted that all of the Examiner's objections and rejections have been traversed. Accordingly, it is submitted that the present application is in condition for allowance and reconsideration of the present application is respectfully requested.

Very respectfully,  
Applicant:



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**Amendments to the Drawings:**

A corrected Fig. 43 is enclosed.

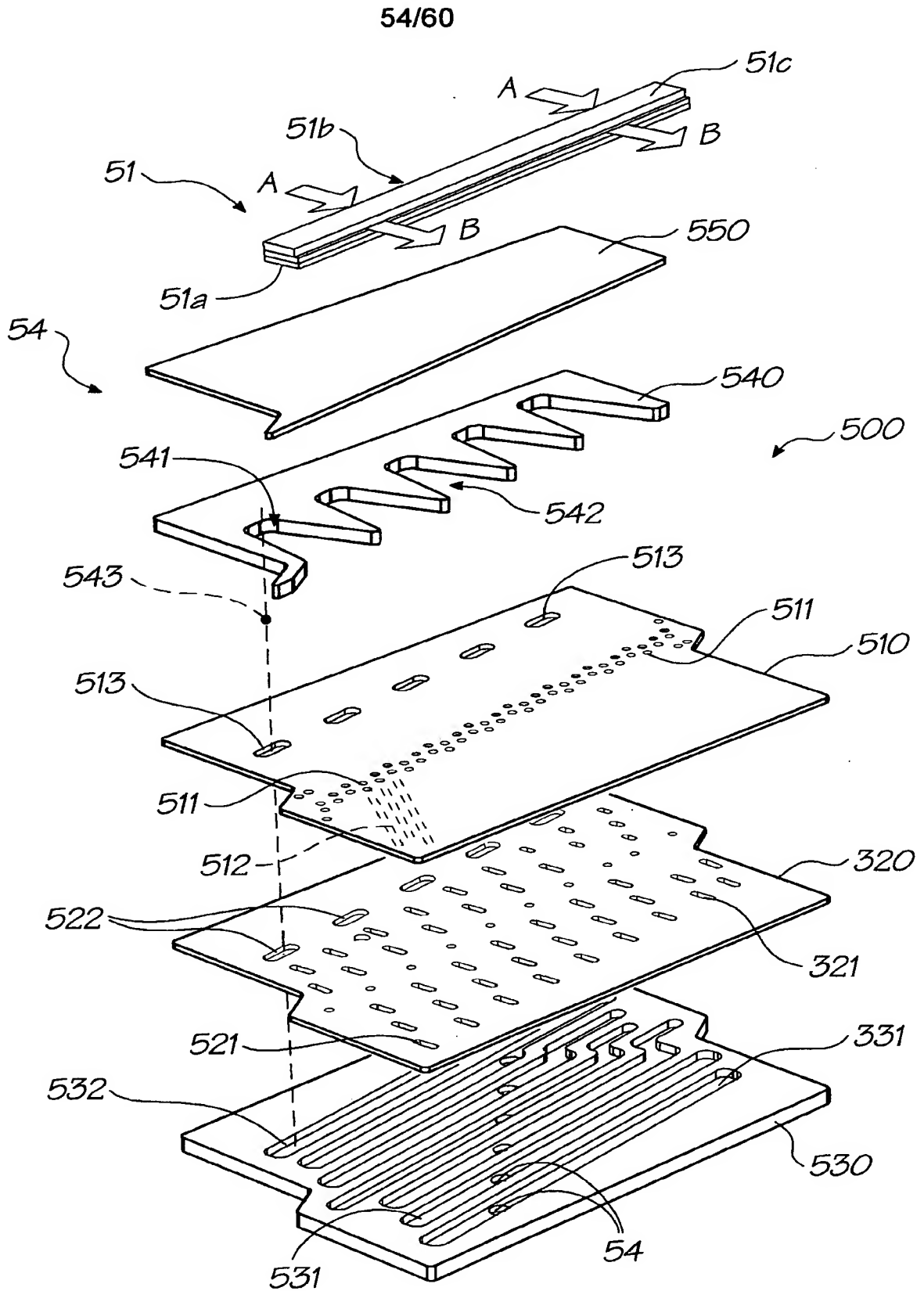


FIG. 43